

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**DEFENDANT'S ASSENTED TO MOTION TO MODIFY CONDITIONS OF
PRE-TRIAL RELEASE**

Now comes the defendant, Benjamin Shacar, who moves this Honorable Court for an order modifying his conditions of release, issued by this Court on August 23, 2022, by allowing him to reside at his in-law's property in Lanesboro, Massachusetts.

As grounds therefore, the defendant states his father-in-law is suffering from cancer and is now bedridden. The defendant proposes to be his father-in-law's caretaker. He has obtained a camper that has been placed on the property belonging to his in-laws and will reside in the camper while he cares for his father-in-law at the residence.

Counsel has discussed this matter with the defendant's supervising probation officer, who has inspected the proposed residence and camper, as well as the assistant United States attorney assigned to the case. The proposed address has been disclosed to both of them. They both assent to the allowance of this motion

Wherefore, Mr. Shacar respectfully requests that this Honorable Court modify his conditions of pre-trial release to allow him to live at the proposed address in Lanesboro, Massachusetts.

Dated: June 21, 2023

Respectfully submitted,

BENJAMIN SHACAR

/s/ William J. O'Neil

WILLIAM J. O'NEIL

Attorney for the Defendant

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CERTIFICATE OF SERVICE

I hereby certify that true copies of this document will be served on the registered parties through the ECF system on this date June 21, 2023.

/s/ William J. O'Neil

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